

ITEM: AT&T 9-31 Please provide the underlying data to the lowest amount of detail available (not a summary) from the PICS/DCPR for the column marked in-place cost in VZ EF&I and power DCPR data 1988.xls for the 377C equipment in Virginia. Either describe or explain such DCPR data in sufficient detail that it can be understood.

REPLY: See General Objections.

VZ VA #338

ITEM: AT&T 9-32    Please specify the average processor utilization separately for 5E switches and DMS switches as reported by SCIS in VZ's non-compliance (standard) cost study.

REPLY:                See General Objections.

VZ VA #339

ITEM: AT&T 9-33     Please explain whether the current contract for Lucent that controls the price of the Lucent equipment purchases that support the vendor discount was negotiated by VZ with the intent to satisfy growth and/or upgrade requirements of existing digital switches or whether they were negotiated with the intent to purchase new host or standalone switches.

REPLY:                See General Objections.

VZ VA # 240

ITEM: AT&T 9-34      Please explain whether the current contract for Nortel that controls the price of the Lucent equipment purchases that support the vendor discount was negotiated by VZ with the intent to satisfy growth and/or upgrade requirements of existing digital switches or whether they were negotiated with the intent to purchase new host or standalone switches.

REPLY:                      See General Objections.

VZ VA #341

ITEM: AT&T 9-35     Please explain whether the current contract for Siemens that controls the price of the Lucent equipment purchases that support the vendor discount was negotiated by VZ with the intent to satisfy growth and/or upgrade requirements of existing digital switches or whether they were negotiated with the intent to purchase new host or standalone switches.

REPLY:                See General Objections.

VZ VA #342

ITEM: AT&T 9-36    Please confirm or deny whether the equipment purchases for Siemens, Lucent or Nortel contain all the equipment necessary to deploy a new switch. Please answer separately with respect to each vendor.

REPLY:                See General Objections.

VZ VA #343

ITEM: AT&T 9-37      Please identify what percentage of all digital loop carrier ("DLC") line switch ports are universal DLC, and what percent of total switched access line ports are UDLC, both in Verizon's Virginia's network today and within the network reflected in Verizon's cost study filing. If the cost study numbers are different than the actually deployed lines in Virginia, please explain how this number was developed for use in the study. Please provide all supporting documentation and calculations.

REPLY:                      See General Objections.

VZ VA #344

ITEM: AT&T 9-38    Please state whether VZ-VA plans to install GR303-compliant digital loop carrier that is integrated into the switch. If not, please explain why not and provide documentation that supports the explanation.

REPLY:                See General Objections.

VZ VA #345



ITEM: AT&T 9-39      What engineering tables do VZ-VA's engineers use to determine trunk group sizes (e.g., Erlang B, Poisson, etc.). Please provide these tables.

REPLY:                See General Objections.

VZ VA #346

ITEM: AT&T 9-40 Please identify the average size trunk group (DSOs) for end office to end office in Virginia.

REPLY: See General Objections.

VZ VA #347

ITEM: AT&T 9-41 Please identify the average size trunk group (DS0s) for end office to end office in Virginia.

REPLY: See General Objections.

VZ VA #348

ITEM: AT&T 9-42    Please identify the average percent of end office to end office trunks of total interoffice trunks in Virginia.

REPLY:                See General Objections.

VZ VA #349

ITEM: AT&T 9-43     Please provide supporting documentation for **all inputs** used to calculate the non conversation time factor, **including the** timeframes of all data collected.

REPLY:                See General Objections.

VZ VA #350

ITEM: AT&T 9-44     Please describe how VZ pays for right to use fees (not limited to RTU included in the study), including, but not limited to per switch, per port, buyout for all switches, etc.

REPLY:                See General Objections.

VZ VA #351

ITEM: AT&T 9-45     Please provide VZ's best estimate of the current or recent annual dollars (and/or percentage) spent for each type of RTU (for all Verizon, per switch, per port, etc.).

REPLY:                See General Objections.

VZ VA #352

ITEM: AT&T 9-46      Please provide VZ's best estimate of how much of the RTU fee included in the cost study is paid for on a per port, per switch or other basis identified in the questions above.

REPLY:                      See General Objections.

VZ VA #353



ITEM: AT&T 9-47    Please explain whether any combination local/tandem switches are currently deployed in Virginia. If so, please provide a list of CLLIs and the manufacturer of each combination switch. For each combination switch, please provide the number of subscriber lines per switch, the number of local trunks and the number of tandem trunks per switch.

REPLY:                See General Objections.

VZ VA #354

ITEM: AT&T 9-48     Please specify what UNE port rate element(s) could apply for a customer on the UNE-Platform.

REPLY:                See General Objections.

VZ VA #355

ITEM: AT&T 9-49     Please confirm or deny whether a subscriber current served on an analog line that migrated to a CLEC, would cause an analog line port UNE charge to be incurred by the CLEC. If not, please identify what port charge would apply and explain why.

REPLY:                See General Objections.

VZ VA #356

ITEM: AT&T 9-50     Please confirm or deny whether a subscriber currently served on IDLC that migrated to a CLEC as a UNE-P customer, would cause an integrated digital loop carrier UNE port charge to be incurred by the CLEC. If not, please identify what port charge would apply and explain why.

REPLY:                See General Objections.

VZ VA #357

ITEM: AT&T 9-51 Please provide VZ's most current engineering guidelines for switching.

REPLY: See General Objections.

VZ VA #358

ITEM: AT&T 9-52     Please provide VZ's most current engineering guidelines and other documentation regarding planning, engineering or deploying GR303 DLC.

REPLY:                See General Objections.

VZ VA #359

ITEM: AT&T 9-53     Please provide a list of new and replacement switch purchases (include a new remote as a new switch) purchased, or planned for purchase between 1999 and 2004 for Verizon Virginia. Identify each switch by CLLI code, if available, the number of lines, the number of trunks, whether it is a new wire center or a replacement switch (for replacement switches include old vendor and new vendor), and the type of switch (host, remote, standalone).

REPLY:                See General Objections.

VZ VA #360

ITEM: AT&T 9-54    Please provide a list of new and replacement switch purchases (include a new remote as a new switch) purchased, or planned for purchase between 1999 and 2004 for any Verizon entity, including the former GTE. Identify each switch by CLLI code, if available, the number of lines, the number of trunks, whether it is a new wire center or a replacement switch (for replacement switches include old vendor and new vendor), and the type of switch (host, remote, standalone).

REPLY:                See General Objections.

VZ VA #361



ITEM: AT&T 9-55    Please provide competitive bid, budget forecasts and all other documentation referencing the price and discounts for new switches placed in Virginia between 1999 and 2004.

REPLY:                See General Objections.

VZ VA #362

ITEM: AT&T 9-56 Please provide a list of new and replacement switch purchases (include a new remote as a new switch) purchased, or planned for purchase between 1999 and 2004 for any Verizon entity, including the former GTE. Identify each switch by CLLI code, if available, the number of lines, the number of trunks, whether it is a new wire center or a replacement switch (for replacement switches include old vendor and new vendor), and the type of switch (host, remote, standalone).

REPLY: See General Objections.

VZ VA #363

ITEM: AT&T 9-57 Please provide competitive bid, budget forecasts and all other documentation referencing the price and discounts for either the most recently installed new host or standalone switch **and a** tandem switch purchased included in the Verizon-wide list above.

REPLY: See General Objections.

VZ VA #364

ITEM: AT&T 9-58    Please provide competitive bid, budget forecasts and all other documentation referencing the price and discounts for either a planned new host or standalone switch and a tandem switch purchase in 2001-2004 in the Verizon-wide list above.

REPLY:                See General Objections.

VZ VA #365

ITEM: AT&T 9-59     Please explain why VZ-VA feels the proposed percentage of *lines* per vendor (Lucent, Siemens, Nortel) is forward-looking.

REPLY:                See General Objections.

VZ VA #366

ITEM: AT&T 9-60      Referencing the vendor equipment purchase lists that support the discount development, please identify what portion is associated with new switch installations, growth additions to existing switches, and upgrading existing switches.

REPLY:                      See General Objections.

VZ VA #367

ITEM: AT&T 9-61     Please provide the call set-up analysis referenced in the NCT factor adjustment. Please specify the year(s) of the data used in the analysis and explain how the data was collected.

REPLY:                See General Objections.

VZ VA #368

ITEM: AT&T 9-62    Please explain, in detail, the disparity in utilization between an analog line port and DLC line ports.

REPLY:                See General Objections.

VZ VA #369



Respectfully submitted,

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CERTIFICATE OF SERVICE

I do hereby certify that true and accurate copies of the foregoing Objections to AT&T's Ninth Set of Data Requests were served electronically and by overnight mail this 30th day of July, 2001, to:

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